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dba El Super
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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 ISABEL TORRES, individually

Case No.: 2:18-cv-00010-JCM-VCF

13
14 Plaintiff,

15
16 vs.
17

18 BODEGA LATINA CORPORATION, d/b/a
EL SUPER, a Foreign Corporation, DOES
19 1-20 and ROE BUSINESS ENTITIES 1-
20 20, inclusive,
21

22 Defendants.
23
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25 **STIPULATION AND ORDER TO EXTEND RESPONSE DEADLINES FOR ALL**
MOTIONS IN LIMINE FOR ALL PARTIES

26 COME NOW Plaintiff Isabel Torres by and through her attorney Christian Z.
27 Smith, Esq. and Defendant Bodega Latina Corporation by and through its attorney
28

1 Michael C. Mills, Esq. and hereby stipulate that the parties may have to and including
2 December 22, 2020 to file their Responses to the following Motions in Limine:

3
4 **Plaintiffs:**

5 Plaintiff's Motion in Limine #1 [ECF 63] to Preclude Dr. Schifini from Offering
6 Opinions About Personal Injury Liens Being Sold

7 Plaintiff's Motion in Limine #2 [ECF 64] to Preclude Any Reference That She
8 Staged or Engaged in Fraud With Respect to the Slip and Fall
Incidents

9 Plaintiff's Motion in Limine #3 [ECF 65] to Preclude Defendant's Medical
10 Experts Opinions Regarding Malingering and/or Secondary Gain

11 Plaintiff's Motion in Limine #4 [ECF 66] to Preclude Any Reference to
12 Medical Write-Downs

13 Plaintiff's Motion in Limine #5 [ECF 67] to Preclude any Reference to
14 When She Retained Counsel

15 Plaintiff's Motion in Limine #6 [ECF 68] to Limit Defenant to One Disclosed
16 Medical Expert

17 Plaintiff's Motion in Limine #7 [ECF 69] to Limit Defendant to One
18 Medical Billing Expert

19 **Defendants:**

20 Defendants Motion in Limine #1 [ECF 60] to Preclude Plaintiff from
21 Introducing Plaintiff's Medical Records and Bills as
22 Evidence Because they Cannot be Authenticated and are
Hearsay

23 Defendants Motion in Limine #2 [ECF 61] Limiting the Opinions of Plaintiff's
24 Expert Dr. William Muir

25 Defendants Motion in Limine #3 [ECF 62] Omnibus Motion
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CONCLUSION

For the foregoing reasons, the parties herein respectfully request this Honorable Court to enter its Order on the Stipulation to Extend Response Deadlines for All Motions in Limine for All Parties to and including December 22, 2020.

Dated this 9th day of November 2020.

Dated this 9th day of November 2020.

RICHARD HARRIS LAW FIRM

BAUMAN LOEWE WITT & MAXWELL

/s/ Christian Z. Smith

/s/ Michael C. Mills

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ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE.

DATED: 11/16/2020